

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

BASE ACCESS, et. al,

Plaintiffs,

v.

NATIONAL PARK SERVICE, et. al,

Defendants.

Case No. 4:25-cv-790

**UNOPPOSED MOTION TO  
RESCHEDULE AUGUST 20, 2025  
INITIAL CONFERENCE AND  
MOTION HEARING**

Defendants respectfully request that the Court re-schedule the August 20, 2025 Initial Conference and Motion Hearing (“August 20 Hearing”) to a date and time between October 9 and 15, 2025. If that time frame is unavailable, Defendants request in the alternative that the Court order the Parties to contact the Court Clerk to identify a date and time that works for the Court and the Parties. Defendants conferred with Plaintiffs before filing this motion and Plaintiffs do not oppose the requested relief. In support of this request, Defendants advise the Court as follows:

1. On May 22, 2025, prior counsel for the United States submitted a notice of withdrawal. Dkt. 15. Current counsel for the United States submitted motions to appear pro hac vice on May 22 and June 10 (Dkts. 14, 18), which the Court granted. On May 23, the Court issued a scheduling order, which set briefing deadlines for Defendants’ responsive pleading and the August 20 Hearing. Dkt. 16.

2. On June 12, Defendants filed a Motion to Dismiss. Dkt. 19. Plaintiffs filed a Response in Opposition on July 3 (Dkt. 23) and Defendants filed a Reply on July 17 (Dkt. 24).

3. Defendants’ attorneys have travel plans that conflict with the August 20 Hearing. The travel was scheduled before the Court set the August 20 Hearing.

4. The Parties have also expressed a willingness to engage in potential settlement discussions.

5. For these reasons, Defendants request that the Court reschedule the August 20 Hearing to a new date and time between October 9 and 15, 2025. In the alternative,

Defendants request that the Court order the Parties to contact the Court Clerk to identify a date and time that works for the Court and the Parties.

6. A proposed order granting the requested relief is filed with this request.

Respectfully submitted this 23rd day of July, 2025.

ADAM R.F. GUSTAFSON  
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